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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

X CORP., a Nevada corporation,

Plaintiff

v.

BRIGHT DATA LTD., an Israeli corporation,

Defendant.

Case No. 3:23-cv-03698-WHA

**DECLARATION OF JOSHUA D.
BRANSON IN SUPPORT OF JOINT
STIPULATION AND MOTION TO
ADJOURN HEARING AND FOR A 10-
DAY STAY PENDING SETTLEMENT**

Hon. William H. Alsup

1 I, Joshua D. Branson, submit this declaration and hereby state under penalty of perjury as
2 follows:

3 1. I am a partner with the law firm Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.
4 (“Kellogg Hansen”), and I am lead counsel for Plaintiff X Corp. (“Plaintiff” or “X”) in this matter.
5 I submit this declaration in support of the parties’ Joint Stipulation and Motion to Adjourn Hearing
6 and for a 10-Day Stay Pending Settlement. I have personal knowledge of the information below.

7 2. On June 21, 2025, X and Bright Data reached a settlement in principle. The parties
8 are now working to finalize the settlement with the aim of filing a joint stipulation of dismissal
9 within the next 10 days.

10 3. Given the settlement in principle, the parties believe that a 10-day stay will promote
11 judicial economy and avoid unnecessary litigation costs while the parties work to finalize the
12 settlement. Similarly, the parties believe that adjourning the June 26 hearing date will promote
13 judicial economy, avoid unnecessary litigation costs, and allow the parties to focus on finalizing
14 their settlement as promptly as possible.

15 4. No previous adjournment of the June 26 hearing has been sought or given. The only
16 previous stay entered in the case was the Court’s June 14, 2024 Order (Dkt. 98-1) temporarily
17 staying the case pending resolution of Bright Data’s motion to disqualify X’s prior counsel.

18 5. The parties have met-and-conferred over this request. Bright Data stipulates to the
19 relief sought.

20
21 Executed on June 21, 2025 in
22 Washington, D.C.

23 By: /s/ Joshua D. Branson
24 Joshua D. Branson
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